

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

Horizon Global Americas Inc.,  
Plaintiff,

v.

CURT Manufacturing, LLC,  
Defendant.

Case No. 2:17-cv-11879-AC-SDD

Hon. Avern Cohn

***JURY TRIAL DEMANDED***

**COUNTER-CLAIMANT'S IDENTIFICATION OF PARADIGM CLAIMS**

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Pursuant to the Court's Order of August 2, 2018, Counter-Claimant CURT Manufacturing, LLC ("CURT") hereby provides the following list of paradigm claims to Counter-Defendant Horizon Global Americas Inc. ("Horizon"):

- U.S. Patent No. 7,745,899, Claim 9
- U.S. Patent No. 7,745,899, Claim 13

CURT also reserves the right to amend or supplement its identification of paradigm claims in light of Horizon's unjustified delay in responding to CURT's Counterclaims. CURT filed its counterclaims on March 30, 2018. Horizon failed to answer prior to the Court's entry of a stay on April 26, 2018. After the parties failed to settle, the Court's stay was lifted on July 12, 2018. Yet Horizon refused to answer until August 15, 2018—only two days before CURT's deadline to identify products, and weeks after Horizon's deadline had passed. Horizon's delay prejudiced CURT, and CURT reserves all of its rights to seek appropriate relief, including, but not limited to, its costs and attorneys' fees associated with Horizon's delay.

Respectfully submitted,

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Dated: August 31, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that on August 31, 2018, my assistant electronically filed the foregoing paper with the Clerk of Court using the ECF system, which will send notification of such filing to all attorneys of record.

By: /s/ J. Michael Huget

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